



Oregon

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November 23, 2005

Mr. Bob Wyatt
Northwest Natural
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**Subject: Groundwater Source Control
NW Natural – Gasco/Siltronic Facilities
ECSE #84 and #183**

Dear Bob:

The Department of Environmental Quality (DEQ) reviewed the November 17, 2005 Memorandum prepared by Anchor Environmental regarding the preliminary identification of technologies for groundwater source control at the NW Natural GASCO site. It was DEQ's expectation, based on our 8/2/05 and 8/9/05 letters to you, that the memorandum would include a groundwater source control screening per the DEQ and Environmental Protection Agency (EPA) September 2005 Interim Final Joint Source Control Strategy (JSCS) and the identification of potential remedial technologies and assembly of potential groundwater source control alternatives that you propose to screen and carry through the Groundwater Source Control Focused Feasibility Study (GWFFS) for both the GASCO site and the work required by DEQ Order No. ECVC-NWR-00-27 on the Siltronic site. The groundwater screening NW Natural submitted is unacceptable, and NW Natural did not assemble the technologies into potential groundwater source control alternatives.

A partial groundwater screening was provided with the October 2005 Preliminary draft Offshore Groundwater Field Sampling Approach GASCO/Siltronic Groundwater Source Evaluation. While informative, the screening did not include all of the applicable screening level values (SLVs) identified in the JSCS. It is important that the source control screening identify all of the SLVs exceeded and the magnitude of exceedance. This information is part of the evaluation that DEQ will use to identify the specific chemicals in groundwater that in DEQ's opinion may present an unacceptable risk or threat to river-related receptors and beneficial uses of the river and the focus of the GWFFS. Groundwater data are available for both the GASCO and Siltronic sites for NW Natural to define the vertical and lateral extent of groundwater contamination along the bank of the Willamette River for the purposes of identifying the area to be considered in the GWFFS and for the identification of potential technologies and potential groundwater source control alternatives for appropriate sections of the riverbank.

DEQ is “disapproving” per Section 6B of DEQ Order No. ECVC-NWR-00-27 the November 17, 2005 memorandum regarding the preliminary identification of technologies for groundwater source control at the NW Natural GASCO site, and requires that the previously requested groundwater source control screening and the identification of potential technologies and assembly of potential groundwater source control alternatives be submitted to DEQ by December 19, 2005. Furthermore, the groundwater source control screening and the identification of potential groundwater source control alternatives is not to be limited to the northern 400 feet of the Siltronic site as indicated on the first page of the November 17, 2005 Anchor Environmental Memorandum. DEQ Order No. ECVC-NWR-00-27 requires that the entire Siltronic site be considered in this evaluation.

Groundwater contaminated by manufactured gas plant waste discharges to the river over a large portion of the Gasco/Siltronics’ waterfront. The GWFFS needs to consider the entire area of contaminated groundwater (both lateral and vertical extent) along the riverbank and focus on upland technologies. In-river technologies such as passive and reactive caps, which are identified by Anchor as groundwater source control technologies, are outside the scope of upland source control. NW Natural will need to negotiate an in-river early action with EPA if the company wants to pursue in-river remedial actions prior to the in-river record of decision.

Source control of the groundwater pathway at the GASCO/Siltronic sites is a high priority for DEQ and EPA. Sufficient upland data exist to move forward with the GWFFS. DEQ will certainly consider additional off-shore data when we select the source control removal action, but we are not prepared to further delay the project as proposed.

The objectives of the transition zone water sampling work adjacent to the GASCO/Siltronic site being conducted by the Lower Willamette Group and the stated objectives of the *Preliminary Draft Offshore Groundwater Field Sampling Approach* do not include the GWFFS objectives identified or inferred in the Anchor Environmental Memorandum. NW Natural should expect that at a minimum a number of additional transects both up and down stream of the proposed in-water study area would be required.

Given the significant exceedances of SLVs in upland groundwater data, DEQ plans on using riverbank monitoring wells for groundwater source control compliance and performance monitoring. DEQ does not anticipate being able to negotiate alternative in-water compliance points for this project with EPA unless the project administration moves to an EPA/DEQ integrated project as has been preliminarily discussed or an EPA lead project.

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Please contact me at (503) 229-5538 if you have any questions.

Sincerely,

Matt McClincy
Project Manager
Portland Harbor Section

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